



Department of Energy
Washington, DC 20585

November 25, 2008

MEMORANDUM FOR INGRID A.C. KOLB

DIRECTOR
OFFICE OF MANAGEMENT

THRU:

KEVIN T. HAGERTY
DIRECTOR
OFFICE OF INFORMATION RESOURCES

FROM:

GLENN S. PODONSKY
CHIEF HEALTH, SAFETY AND SECURITY OFFICER
OFFICE OF HEALTH, SAFETY AND SECURITY

SUBJECT:

Page Change to Department of Energy Order 420.1B, *Facility Safety*

PURPOSE:

This memorandum provides justification for a "page change" revision to Department of Energy (DOE) Order (O) 420.1B, *Facility Safety* (see attachment). This change will add a requirement to use the new DOE Standard 1189, *Integration of Safety Into the Design Process*, during a facility design, and a requirement to use active building confinement as the preferred design alternative over passive confinement during a facility design unless otherwise technically justified. Both of these new requirements promote integration of safety early and throughout a facility design process.

In addition, the page change includes administrative changes made to reflect DOE's reorganization in October 2007 that resulted in the Office of Health, Safety and Security assuming responsibilities previously assigned to the Office of Environment, Safety and Health and Office of Security and Performance Assurance, which were eliminated in the reorganization.

JUSTIFICATION:

The addition of a requirement to integrate safety into the design process by using DOE Standard 1189 is needed to ensure that the Standard is implemented by DOE and its contractors to meet the Deputy Secretary of Energy's expectations that: (1) safety be fully integrated into design early in the project, and (2) both the project management and safety directives lead projects on the right path so that safety issues are identified and addressed adequately early in the project design.



DOE Standard 1189 provides the details for integrating safety into the design process. Currently, DOE O 413.3A, *Program and Project Management for the Acquisition of Capital Assets*, is undergoing a "page change" revision to incorporate DOE Standard 1189. Revision of DOE O 420.1B is needed to provide consistency with DOE O 413.3A and to ensure that some DOE projects not covered under DOE O 413.3A (i.e., those costing less than \$20 million) are also addressed.

The modification of the requirement for the confinement of radioactive material to explicitly identify use of active confinement as the preferred approach is needed to ensure careful consideration of active confinement during a facility design. This need was recognized in the Secretary of Energy's July 12, 2006 response to Defense Nuclear Facilities Safety Board Recommendation 2004-2, *Active Confinement Systems*. Since it is important that the confinement design approach be identified early in the design process, the addition of this requirement into DOE O 420.1B supports effective implementation of DOE Standard 1189. We are requesting a 30-day processing period to incorporate the DOE Standard 1189 into the directive.

IMPACT:

Incorporating DOE Standard 1189 into DOE O 420.1B will help ensure that safety is integrated early into the design process in order that DOE nuclear projects are effectively managed. This should result in increased safety and resource savings.

CONTACT: Jim O'Brien, HS-21, 3-1408

CTA CONCURRENCE:

_____ (DOE/Energy)

_____ (DOE/Science)

_____ (NNSA)

DECISION:

Concur: _____

Non-concur: _____

Timeframe: ☐ 30 days ☐ 60 days ☐ 90 days ☐ 120 days

Date: _____

Attachment